
Student Data Collection Policy

1. Overview

Using Student Personally Identifiable Information (PII) effectively and responsibly is foundational to making informed student educational decisions. Capturing accurate information is necessary for public, state, and federal reporting. Data also needed to create accurate school and district performance reports. State and federal laws establish baseline parameters for what is permissible when collecting and sharing student information. [LEP] uses additional applicable state and federal guidelines and strict processes to protect the privacy of every student and to ensure the confidentiality and security of all data Pinnacle Charter School collects.

2. Purpose

Pinnacle Charter School's primary responsibility is to service the educational and administrative needs of students as outlined in state and federal law. To provide necessary services, it is required that we collect, store, manage, and process various pieces of student, teacher, and organizational data. All [LEP] data collections are governed by federal and state statutes, laws, and rules. The purpose of this policy is to identify, categorize, and communicate the information Pinnacle Charter School collects as part of its commitment to transparency and student services.

3. Scope

This policy applies to all Pinnacle Charter School staff.

4. Policy

A. COLLECTION CATEGORIES

The following categories of PII shall be collected as part of normal Pinnacle Charter School operations:

- Student Demographics
 - Name
 - Birthdate
 - Race/Ethnicity
 - Gender
- Enrollment
 - State Assigned Student Identifier (SASID)
 - School
 - District
 - Grade level
 - Entry/Exit date/type
 - Courses completed
 - Course Educator ID
- Federal and State Program Participation
 - Title I
 - Special Education/Gifted
 - Free/Reduced lunch
 - English Language Learner
 - Migrant status
- Early Childhood
 - Enrollment start/end dates

- Early Childhood Assessments
- Special Education (Federal IDEA and State)
 - Disability/Gifted type(s)
 - Services received
 - Discipline incidents
 - Parent contact information
 - Individualized Education Program (IEP) Plans and Information
- English Language Learners (ELL)
 - Primary language
 - English language proficiency level
- Migrant
 - Certificate of Eligibility
 - Services received
- Colorado Measures of Academic Success (CMAS) including PARCC
 - Scores/results
 - Testing accommodations
 - Student growth percentiles
- Alternative/Special needs test results (program specifics)

Policy Note: Data collection requirements change from time to time based on new and revised laws. The list provided here is not intended to be an exhaustive element or domain listing of Student PII collected and managed. Rather, it provides a basis for the types of information managed through Pinnacle Charter School Specific information on data collections should be directed to the Chief Business Officer at Pinnacle Charter School.

A. DATA SECURITY AND PROTECTIONS

Pinnacle Charter School shall use industry standard best practices to protect and safeguard Student PII. Controls employed against various systems include but are not limited to:

- User Access Control
 - Identity Management (Authentication/Authorization)
 - Role based access
 - Strong passwords and controls
 - Ninety (90) day password expiration
 - Local access management
 - Access logging/monitoring (device & location)
 - Intrusion penetration/vulnerability testing
 - Laptop/mobile device password locks
 - Annual mandatory user security awareness training
- At-Rest and In-Transit Data Encryption
 - Multi-level database encryption
 - Secure File Transfer Protocol (SFTP)
 - HTTPS and TLS Security
- Physical security
 - Controlled building and data center access
 - Video surveillance
 - Key Card Access
- Student Identity Protections
 - Suppression of small N-sizes for aggregated student data reports
 - Blurring and various best-practice data de-identification techniques to protect student privacy

B. PII ACCESS AND RETENTION

Student PII shall be accessed, stored and retained according to applicable state and federal guidelines surrounding educational records and archiving policy. Minimally, the following controls shall be in place:

- PII access is granted explicitly to the following personnel on a need to know basis:
 - Authorized and authenticated Pinnacle Charter School education officials and information services personnel
 - Authorized and authenticated school and Charter School Institute personnel
 - Contracted vendors with signed privacy obligations for specified applications and designated “School Official” status
 - Vendors designated as School Service Contract Providers or School Service On-Demand Providers in accordance with Colorado’s Student Data Transparency and Security Act

Retention is based on schedules produced and recommended at the State and applicable Federal levels. At a minimum, all electronically archived PII shall be:

- Encrypted and rendered non-individually identifiable through data partitioning
- Access is restricted and actively monitored

Please see the Pinnacle Charter School Data Retention Policy for more information on Pinnacle Charter School archiving and retention.

5. Audit Controls and Management

On-demand documented procedures and evidence of practice should be in place for this operational policy as part of the Pinnacle Charter School general management practices.

6. Enforcement

Staff members found in policy violation may be subject to disciplinary action, up to and including termination.

7. Distribution

This policy is to be distributed to all Pinnacle Charter School staff.

8. Policy Version History

Version	Date	Description	Approved By
1.0	12/15/2017	Initial Policy Drafted	
